



LEAGUE OF WOMEN VOTERS OF CALIFORNIA

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California Energy Commission
Dockets Office
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Subject: The 2005 Energy Report November 18 Workshop

The Energy Committee of the League of Women Voters of California commends the Integrated Energy Policy Report (IEPR) staff on the progress it has made toward developing a systematic methodology to assess the future resources that will be needed to meet the state's electric demands over the next ten years. We note that you are not focusing exclusively on the resources of the investor-owned utilities but rather are seeking to include the load obligations and the capacity needs of all Load-Serving Entities. Integrated long-term planning that exempts 30 percent of the total resources in the state from consideration would be a gross mistake.

We also commend the three energy agencies for making important steps toward increased collaboration. This is not a time for turf wars, and we are pleased that we do not see any developing. It is vital that planning and assessment activities be coordinated and with no duplication of efforts. Full advantage should be taken of the recognized competency and experience of the staff of each agency.

Even with the participation of all Load Serving Entities in the state in the assessment and planning process, there will remain notable uncertainties. The price of natural gas is a major one. Another is the possible creation of a non-core market that could destabilize the regulated utility structure. The long-term reliability of the Qualified Facilities (QFs) is assumed, but that may be unrealistic since many of those facilities are getting old. We urge that attention be given to the implication of these and other identified uncertainties.

Furthermore, we are concerned about the impact of the Federal Energy Regulatory Commission in the planning process. We believe that the relationship of the federal and state roles must be more clearly delineated if effective strategic planning is to be realized.

If the IEPR staff is considering additional workshops on Electricity Resource Planning, we would like to suggest two topics:

- 1) The authorities and responsibilities of the non-IOU Load Serving Entities and the Federal Energy Regulatory Commission in developing a long-term integrated transmission planning process; and
- 2) A technical workshop on how the transmission system is actually coordinated, and how long-term planning and coordination can be brought down from the concept level to the busbar level. This latter workshop would also encompass the economics of electric transmission.

Thank you for your consideration of our comments.

Sincerely yours,

Jacqueline Jacobberger
President

cc: Jane Turnbull